J. Stephen Peek 1 Nevada Bar No. 1758 **HOLLAND & HART LLP** 2 9555 Hillwood Drive, 2nd Floor Las Vegas, NV 89134 3 Phone: (702) 222-2544 Fax: (702) 669-4650 4 speek@hollandhart.com raloosvelt@hollandhart.com 5 Brett L. Foster (pro hac vice admission) 6 Tamara L. Kapaloski (pro hac vice admission) DORSEY & WHITNEY LLP 7 111 S. Main Street Suite 2100 8 Salt Lake City, UT 84111-2176 Telephone: (801) 933-7360 Facsimile: (801) 933-7373 9 foster.brett@dorsev.com kapaloski.tammy@dorsey.com 10 Attorneys for Plaintiff Snap Lock Industries, Inc. 11 UNITED STATES DISTRICT COURT 12 DISTRICT OF NEVADA 13 Case No. 2:17-cv-02742-RFB-BNW 14 **SNAP LOCK INDUSTRIES, INC.,** JOINT STIPULATED MOTION TO STAY 15 Plaintiff, CASE DEADLINES PENDING SETTLEMENT DISCUSSIONS AND 16 VS. [PROPOSED] ORDER 17 SWISSTRAX CORPORATION. (THIRD REQUEST) 18 Defendant. 19 20 Plaintiff Snap Lock Industries, Inc. ("Snap Lock") and Defendant Swisstrax Corporation 21 ("Swisstrax") (collectively, "Parties"), through their undersigned counsel, hereby respectfully jointly 22 submit this Joint Stipulated Motion to Stay Case Deadlines Pending Settlement Discussions, and state 23 as follows: 24 1. On March 8, 2017, the Parties filed a Joint Stipulated Motion to Stay Case Deadlines 25 Pending Settlement Discussions (the "Stay Motion") (ECF No. 116), advising the Court that the Parties 26 have agreed to engage in a settlement conference or mediation in an attempt to resolve this dispute, 27 and that they anticipated that the conference or mediation would be completed by May 6, 2019. The

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Parties requested that the Court stay all case deadlines until after the settlement conference or mediation in order to preserve resources of the Court and the Parties in the event that the settlement negotiations dispose of the dispute.

- 2. On March 14, 2019, the Court entered an order granting the Stay Motion. *See* ECF No. 119.
- 3. Although the Parties subsequently agreed on a mediator, they were not able to secure a mediation date prior to the May 6, 2019, deadline, as previously contemplated. As a result, on March 27, 2019, the parties filed their Joint Stipulated Motion to Stay Case Deadlines Pending Mediation ("Second Stay Motion"). *See* ECF No. 121.
- 4. On April 1, 2019, the Court entered an order granting the Second Stay Motion, and scheduled a status check for June 25, 2019, at 9:00 a.m. *See* ECF No. 123.
- 5. On June 7, 2019, the Parties participated in a mediation before the Honorable Judge Pro (Ret.) in Las Vegas, Nevada. Although the Parties were unable to resolve their dispute during the June 7 mediation, settlement discussions are ongoing and the Parties are currently actively involved in attempting to resolve the dispute.
- 6. As such, the Parties respectfully request that the stay of case deadlines be extended to the week of July 29, 2019, or to the Court's earliest convenience after that time, to allow the Parties to dedicate their efforts to the potential settlement of this dispute. The Parties also request that the June 25, 2019, status check be taken off calendar and rescheduled to the week of July 29, 2019, or to the Court's earliest convenience after that time. The Parties submit that this request will preserve judicial and party resources in the event that settlement negotiations dispose of the case.
  - 7. The Parties do not currently have a trial date.

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8. Good cause exists for this request. Staying the case deadlines will preserve the 1 resources of both the Court and the Parties in the event that the ongoing settlement negotiations dispose 2 3 of this dispute. The Parties are not seeking the extensions for purposes of undue delay. 4 Dated this 20th day of June, 2019. 5 6 DORSEY & WHITNEY LLP **DICKINSON WRIGHT PLLC** 7 /s/ Tamara L. Kapaloski /s/ Steven A. Caloiaro 8 Brett L. Foster John L. Krieger Tamara L. Kapaloski Dorsey & Whitney, LLP Steven A. Caloiaro 9 Christian T. Spaulding 111 South Main Street, Suite 2100 8363 West Sunset Road, Suite 200 Las Vegas, NV 89113 Salt Lake City, UT 84111-2176 10 Email: jkriger@dickinson-wright.com Email: foster.brett@dorsey.com 11 Email: scaloiaro@dickinson-wright.com Email: kapaloski.tammy@dorsey.com Email: cspaulding@dickinson-wright.com 12 13 IT IS SO ORDERED. IT IS FURTHER ORDERED that the status check currently set for June 25, 2019 is 14 VACATED and CONTINUED to 9:00 a.m. July 29, 2019. 15 16 Hon. Brenda Weksler United States Magistrate Judge 17 DATED: June 20, 2019 18 19 20 21 22 23 24 25 26 27 28

**CERTIFICATE OF SERVICE** 1 I hereby certify that on the 20<sup>th</sup> day of June, 2019, the foregoing **JOINT STIPULATED** 2 MOTION TO STAY CASE DEADLINES PENDING SETTLEMENT DISCUSSIONS 3 [PROPOSED] ORDER was served via e-mail upon the following: 4 5 J. Stephen Peek 6 Nevada Bar No. 1758 HOLLAND & HART LLP 7 9555 Hillwood Drive, 2nd Floor Las Vegas, NV 89134 8 Phone: (702) 222-2544 9 Fax: (702) 669-4650 speek@hollandhart.com 10 Attorneys for Plaintiff Snap Lock Industries, Inc. 11 12 John L. Krieger Steven A. Caloiaro 13 Christian T. Spaulding DICKINSON WRIGHT PLLC 14 8363 West Sunset Road, Suite 200 Las Vegas, NV 89113-2210 15 jkrieger@dickinson-wright.com scaloiaro@dickinsonwright.com 16 cspaulding@dickinsonwright.com 17 18 Attorneys for Defendant Swisstrax Corporation 19 20 /s/ Tamara L. Kapaloski 21 22 23 24 25 26 27 28